



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MWG  
F. #2022R00544

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 3, 2023

By ECF

The Honorable Hector Gonzalez  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Christopher Gunn  
Criminal Docket No. 22-314 (HG)

Dear Judge Gonzalez:

Pursuant to the Court's Order dated March 2, 2023, the government respectfully submits this letter to address whether the Court should revoke the modification to the defendant's bond that permits the defendant to leave his residence for childcare-related services approved by Pretrial Services (the "Modification").

The government agrees with Pretrial Services that the Modification should be revoked. Since the Modification went into effect just several weeks ago on February 9, 2023, the defendant has deviated from approved activities and thereby violated the trust of Pretrial Services on multiple occasions. Even more troubling is the defendant's reportedly defiant and disrespectful attitude toward his supervising officer and the terms of his supervision, generally. When confronted with his violations, the defendant told his supervising officer that he did not "give a f\*\*\* anymore" and refused to answer questions. The defendant's behavior toward his

supervising officer demonstrates that he cannot be trusted to continue abiding by the terms of his bond as modified, and that the Modification should be revoked.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Michael W. Gibaldi  
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cc: Clerk of the Court (HG) (by ECF)  
Counsel of Record (by ECF)  
U.S. Pretrial Services Officer Bianca Carter (by E-mail)